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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
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16 HEATHER ST. CLAIR,
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18 Plaintiff,
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20 vs.
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22 ERIN CAPITAL MANAGEMENT,
23 LLC, and ELTMAN, ELTMAN &
24 COOPER, P.C.
25 Defendants.
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Case No. 11CV1795 JM BLM

**JOINT MOTION TO DISMISS
ACTION**

IT BEING HEREBY STIPULATED by and between the parties to this action through their counsel of record that the above-captioned action be dismissed with prejudice pursuant to FRCP 41(a)(1) as a result of the settlement of this case, the parties jointly move this court to dismiss this action and all claims asserted therein with prejudice.

1 Dated: December 5, 2011

2 **LESTER & ASSOCIATES**

3
4 By: /s/Patric A. Lester
5 **PATRIC A. LESTER**
6 Attorney for Plaintiff Heather St. Clair
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9 Dated: December 5, 2011

10 **LAW OFFICES OF TIMOTHY P. JOHNSON**

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12 By: /s/Timothy Johnson
13 **TIMOTHY P. JOHNSON**
14 Attorneys for Defendants Erin Capital
15 Management, LLC and Eltman, Eltman & Cooper,
16 P.C.
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LAW OFFICES OF TIMOTHY P. JOHNSON

St. Clair v. Erin Capital Management et al.
USDC, Case No. 11CV1795 JM BLM

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 1970 Old Tustin Avenue, Second Floor, Santa Ana, California 92705.

On December 5, 2011, I served a true copy of **JOINT MOTION TO DISMISS ACTION** on all interested parties in this action by:

☐ By depositing it in the United States mail in a sealed envelope with the postage thereon fully prepaid to the following:

☐ By overnight delivery using an envelope or package provided by the overnight service carrier and addressed to the following:

☒ By ECF: On this date, I electronically filed the document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to the following:

Robert Stempler
 CONSUMER LAW OFFICE
 OF ROBERT STEMLER
 P.O. Box 1721
 Palm Springs, CA 92263

Patric A. Lester
 LESTER & ASSOCIATES
 5694 Mission Center Road #358
 San Diego, CA 92108

I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

EXECUTED on December 5, 2011 at Santa Ana, California.

/s/Timothy Johnson
 TIMOTHY P. JOHNSON